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April 18, 2022

**VIA ECF**

Honorable LaShann DeArcy Hall  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Trooper 1 v. New York State Police, et al., 22 Civ. 893 (LDH)(TAM)

Dear Judge DeArcy Hall:

We represent former Governor Andrew Cuomo (“Governor Cuomo”) in this matter and submit this letter in response to Plaintiff’s motion to proceed anonymously pursuant to Fed. R. Civ. P. 10(a). Governor Cuomo has been aware of Plaintiff’s identity for some time and has not publicly disclosed it—as Plaintiff notes. Further, Governor Cuomo does not intend to engage in (nor has he engaged in) a “campaign of intimidation” against Plaintiff, as alleged in her motion papers. Mem. at 4-5.

At this time, Governor Cuomo does not oppose Plaintiff’s motion. He reserves the right, however, to revisit the issue. *See, e.g., Doe v. Delta Airlines, Inc.*, 310 F.R.D. 222, 223 (S.D.N.Y. 2015) (denying motion to proceed pseudonymously at trial after having previously “granted Doe’s ex parte motion for leave to file her Complaint under a pseudonym”); *Doe v. City of New York*, No. 15-CV-117 (S.D.N.Y. Feb. 4, 2016), ECF No. 24 at 8 (“Plaintiff’s motion to proceed anonymously is GRANTED at this time and the Court authorizes Plaintiff to file the proposed Amended Complaint. However, Defendants may move to revisit the issue of Plaintiff’s anonymity before the case proceeds to trial.”).

Governor Cuomo further plans to seek a pre-motion conference in anticipation of moving to dismiss certain claims in the amended complaint for failure to state a claim.

Respectfully submitted,

By: /s/ Rita M. Glavin

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